IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:

BRAZOS ELECTRIC POWER COOPERATIVE, INC.,

Debtor.¹

BRAZOS ELECTRIC POWER COOPERATIVE, INC. AND THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,

Plaintiff / Intervenor-Plaintiff,

v.

ELECTRIC RELIABILITY COUNCIL OF TEXAS, INC.,

Defendant.

Chapter 11

Case No. 21-30725 (DRJ)

Adv. Proc. No. 21-03863 (DRJ)

WITNESS AND EXHIBIT LIST FOR OCTOBER 1, 2021 COMPLIANCE HEARING

WITNESSES:

1. All persons listed on the witness list of any <u>Judge</u>: Honorable David R. Jones

party; and Courtroom 400

2. Any rebuttal and/or impeachment witness. Hearing Date: October 1, 2021

Hearing Time: 11:30 a.m. (Central)

Party's Name: Brazos Electric Power

Cooperative, Inc.

Attorneys' Names: Louis R. Strubeck Jr.

Jason L. Boland

¹ The Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number is: Brazos Electric Power Cooperative, Inc. (4729). Additional information regarding this case may be obtained on the website of the Debtor's claims and noticing agent at http://cases.stretto.com/Brazos. The Debtor's address is 7616 Bagby Avenue, Waco, TX 76712.

Paul Trahan Lino Mendiola Michael Boldt

Attorneys' Phone: (713) 651-5151

Nature of Proceeding: Compliance Hearing on

Discovery

EXHIBITS

Ex.	<u>Description</u>	Offered	Objection	Admitted / Not Admitted	Disposition
1.	ERCOT's First Requests for				
1.	Production to Brazos Electric				
	Power Cooperative, Inc.				
2.	Brazos Electric Power				
	Cooperative, Inc.'s				
	Requests for Production to				
	ERCOT				
3.	Official Committee of Unsecured				
	Creditors' Requests for				
	Production to Brazos Electric				
	Power Cooperative, Inc., dated				
	March 30, 2021				
4.	Official Committee of Unsecured				
	Creditors' Requests for				
	Production to Brazos Electric				
	Power Cooperative, Inc., dated				
	June 14, 2021				
5.	Compliance Report [To be filed in				
	advance of hearing]				
6.	Any document or pleading filed in				
	the above-captioned case,				
	including any exhibits thereto				
7.	Any exhibit designated by any				
	other party				
8.	Any exhibit necessary to rebut the				
	evidence or testimony of any				
	witness offered or designated by				
	any other party				

The Debtor reserves (i) the right to amend and/or supplement this Witness and Exhibit List at any time prior to the hearing; and (ii) the right to use additional exhibits for purposes of rebuttal

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or impeachment and to further supplement the foregoing Witness and Exhibit List as appropriate.

The Debtor also reserves the right to rely upon and use as evidence (i) exhibits included on the

exhibit lists of any other parties in interest, and (ii) any pleading, hearing transcript, or other

document filed with the Court in the above-captioned matter.

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Dated: September 29, 2021 Houston, Texas Respectfully submitted,

EVERSHEDS SUTHERLAND (US) LLP

By: /s/ Lino Mendiola

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By: /s/ Jason L. Boland

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Counsel for the Debtor and Debtor in Possession

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing document was served upon the counsel and parties of record, electronically through the Bankruptcy Court's Electronic Case Filing System on those parties that have consented to such service on the 29th day of September, 2021.

/s/ Maria Mokrzycka
Maria Mokrzycka